

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

GREGORY BOYER, as Administrator of
the Estate of Christine Boyer, and on his
own behalf,

Plaintiff,

v.

ADVANCED CORRECTIONAL
HEALTHCARE, INC., LISA PISNEY,
AMBER FENNIGKOH, MONROE
COUNTY, WISCONSIN, STAN
HENDRICKSON, DANIELLE WARREN,
and SHASTA PARKER,

Defendants.

No. 20-cv-1123-jdp

GREGORY BOYER, as Administrator of
the Estate of Christine Boyer, and on his
own behalf,

Plaintiff,

v.

USA MEDICAL & PSYCHOLOGICAL
STAFFING, NORMAN JOHNSON,
TRAVIS SCHAMBER, WESLEY
HARMSTON, and JILLIAN
BRESNAHAN,

Defendants.

No. 22-cv-723-jdp

**COUNTY DEFENDANTS' UNOPPOSED MOTION TO EXTEND DEADLINE
FOR ALL DEFENDANTS TO RESPOND TO MOTION TO INTERVENE
AND MODIFY PROTECTIVE ORDER**

Defendants Monroe County, Stan Hendrickson, Danielle Warren, and Shasta Parker (the "County defendants") hereby move this Court for an order extending the deadline for all defendants to respond to the pending Motion to Intervene and to Modify Protective Order (ECF No. 165, Case No. 20-cv-1123; ECF No. 49, Case No. 22-cv-723)

from December 14, 2023, to January 4, 2024, consistent with the text order entered by this Court on December 5, 2023, so extending the deadline to respond for defendants Advanced Correctional Healthcare, Inc., Lisa Pisney, and Amber Fennigkoh (the “ACH defendants”) (ECF No. 166, Case 20-cv-01123; ECF No. 50, Case 22-cv-00723). The undersigned counsel for the County defendants is authorized to state that no party, including the proposed intervenor, opposes this motion.

In support of this motion, the County defendants state as follows:

1. On November 30, 2023, the proposed intervenor, the Estate of Demetrius Stephenson, filed the subject Motion to Intervene and to Modify Protective Order.

2. By text order entered on December 5, 2023, this Court granted a motion by the ACH defendants to extend the deadline for said defendants to respond to the motion to January 4, 2024.

3. Counsel for the County defendants has been working with counsel for the proposed intervenor and counsel for plaintiff to clarify and, if possible, narrow the scope of the records relating to the County defendants that would be produced by plaintiff pursuant to the subpoena underlying the motion to intervene and to modify the existing protective order.

4. Consistent with those ongoing efforts, the undersigned counsel for the County defendants is not yet certain what, if any, response to the motion to intervene will be necessary on behalf of the County defendants.

5. Assuming a response is ultimately necessary, the County defendants respectfully submit that it would be more efficient for the parties and this Court for their response (and any response by defendants in Case No. 22-cv-723) to be filed at the same

time as the response of the ACH defendants, so as to avoid a rolling set of responses by defendants and replies by the proposed intervenor.

6. The undersigned counsel has conferred with counsel for the other parties of record, as well as the proposed intervenor, and is authorized to state that no party opposes this motion.

WHEREFORE, the County defendants respectfully request that this Court enter an order extending the deadline for all defendants to respond to the pending Motion to Intervene and to Modify Protective Order from December 14, 2023, to January 4, 2024, consistent with the text order entered by this Court on December 5, 2023, so extending the deadline for the ACH defendants.

December 13, 2023

Respectfully submitted:

HANSEN REYNOLDS LLC

/s/ Andrew A. Jones

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